

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES

V. CRIMINAL NO. 04 10231 MLW
PETER V. MAGGIO, III, *ET AL*

EX-PARTE MOTION OF DEFENDANTS MATT HAVEY, LOUIS A.
PARADISO AND SEAN SACCO FOR FUNDS TO OBTAIN COPIES
OF EXCULPATORY DISCOVERY

The defendants and their counsel have viewed thousands of pages of documents at the headquarters of the FBI (1 Center Plaza, Boston, MA).

At any trial of this case by having copies of these documents, defense counsel can cross-examine witnesses who testify against each of the defendants respectively.

As an example, on countless documents the name "Matthew Havey" appears. That is not his name, and he doesn't sign it that way.

But in order to do so, counsel will need their own copies of the documents.

Only one copy of the entire set is necessary as counsel can allocate which pages belong to which defendant.

It is estimated that photostatting these pages at approximately eight cents per page will incur a cost that may approach \$3,500.00.

Wherefore the defendants move for allowance of this motion to permit them to incur that cost.

/s/Roger Witkin

Roger Witkin
Counsel for Matt Havey
6 Beacon Street, Suite 1010
Boston, MA 02108
Tel. 617 523 0027
Fax 617 523 2024
BBO No. 531780

DATE: June 29, 2005

/s/Scott P. Lopez

Scott P. Lopez
Attorney for Louis A. Paradiso
24 School Street
Boston, MA 02108
Tel. 617 742 5700
Fax 617 742 5715

DATE: June 29, 2005

/s/William M. White, Jr.

William M. White, Jr.
Attorney for Sean Sacco
1 Faneuil Hall Marketplace
South Marketplace
Boston, MA 02109 1649
Tel. 617 723 7339
Fax 617 723 7731

DATE: June 29, 2009